

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARITRANS OPERATING COMPANY)	
L.P.)	
)	CV NO. 02-4429
Plaintiff)	
)	ADMIRALTY
v.)	
)	
CHRIS-.MARINE USA, INC.)	
)	
Defendant)	

**MOTION OF MARITRANS OPERATING COMPANY, L.P. FOR
ADMISSION PRO HAC VICE OF JEFFREY J. PUTNAM, ESQUIRE**

Plaintiff Maritrans Operating Company L.P., through its attorney, Blank Rome LLP, moves this Honorable Court pursuant to Local Rule **83.5.2** to admit Jeffrey J. Putnam, Esquire pro hac vice and in support states as follows:

1. Jeffrey J. Putnam is admitted to practice before, and is a member in good standing of the Texas State Bar and the United States District Court for the Southern District of Texas. See Declaration of Jeffrey J. Putnam, Esquire, attached as Exhibit "A".

2. Jeffrey J. Putnam, Esquire, is not now, and has not ever been, the subject of any disciplinary action by any state or federal court, bar association, or administrative agency. Id.

3. The law firm of Cohen, Gorman & Putnam LLP in which Jeffrey J. Putnam is a partner, with offices at The Niels Esperson Building, 808 Travis Street, Houston, Texas has been engaged to represent Maritrans for the purpose of taking the deposition at Houston, TX of a non-party witness. Id.

4. Jeffrey J. Putnam, Esquire has read, and is familiar with, the provisions of the judicial codes which pertain to the jurisdiction and practice in the United States District Courts, the Federal Rules of Evidence, and the Local Rules of the United States District Court for the Eastern District of Pennsylvania and will faithfully adhere thereto. Id.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MARITRANS OPERATING COMPANY
L.P.**

Plaintiff

v.

CHRIS-MARINE USA, INC.

Defendant

CV NO. 02-4429

ADMIRALTY


ORDER

AND NOW, this ____ day of _____, 2003, upon consideration of the motion of Maritrans Operating Company, L.P. for the admission pro hac vice of Jeffrey J. Putnam, Esquire and any response thereto, it is hereby ORDERED and DECREED that Jeffrey J. Putnam, Esquire, a partner in the law firm of Cohen, Gorman and Putnam, LLP, Houston, TX, is admitted to practice before this Court pro hac vice for the purposes of this action.

BY THE COURT:

WHEREFORE, it is respectfully requested that ~~an~~ Order be entered permitting Jeffrey J. Putnam, Esquire to be admitted to practice before this Court for the limited purposes of this action.

BLANK ROME LLP

By: 
Jeffrey S. Moller (PA Atty ID #41049)
One Logan Square
Philadelphia, PA 19103

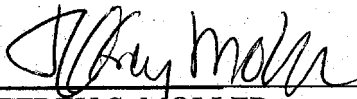
Attorneys for Plaintiff

Dated: November 24, 2003

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2003, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Jeffrey J. Putnam, Esquire was served, via facsimile and first class mail, as follows:

Stephen M. Calder, Esquire
Palmer, Biezup & Henderson
620 Chestnut Street
Suite 956, Public Ledger Building
Philadelphia, PA 19103



JEFFREY S. MOLLER

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARITRANS OPERATING COMPANY L.P.)	CV NO. 02-4429
Plaintiff)	* *
)	ADMIRALTY
v.)	
)	
CHRIS-MARINE USA, INC.)	
)	
Defendant)	

**DECLARATION IN SUPPORT OF MOTION TO
ADMIT JEFFREY J. PUTNAM, ESQUIRE PRO HAC VICE**

I, JEFFREY J. PUTNAM, declare:

1. I have personal knowledge of the hereinmentioned facts, and would competently testify thereto if called upon to do so. I am an attorney duly licensed to practice law in the state and federal courts within the U.S. District Court for the Southern District of Texas, the State Bar of Texas, the Fifth Circuit Court of Appeals and the U.S. Supreme Court.

2. I **am** in good standing in each of the jurisdictions and/or courts named above, have never been the subject of any disciplinary action, and **am** not currently suspended or disbarred from the practice of law in any jurisdictions and/or courts. I **am** a member of the law firm of Cohen, Gorman & Putnam LLP, and my business address is The Niels Esperson Building, 808 Travis Street, Suite 808, Houston, TX 77002-5710.


3. This declaration is made in support of my application to appear as counsel pro hac vice for plaintiff Maritrans Operating Company, L.P. in the above-entitled litigation. I have been engaged by Maritrans Operating Company, L.P. for the purpose of taking the deposition of a non-party witness at Houston, Texas.

4. I **am** a resident of the State of Texas, and **am** not regularly engaged in the practice of law or any other business in the Commonwealth of Pennsylvania.

5. Within the last two years, I have not applied to appear pro hac vice in any action before the courts of the Commonwealth of Pennsylvania.

6. I have read and am familiar with the provisions of the judicial codes which pertain to the jurisdiction and practice in the United States District Courts, the Federal Rules of Evidence and the Local Rules of the United States District Court for the Eastern District of Pennsylvania and will faithfully adhere thereto.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct.


JEFFREY C. PUTNAM